

EXHIBIT B

From: Durone, Anthony J.
Sent: Thursday, January 5, 2023 1:48 PM
To: Drew Brown <drew@greensborolawcenter.com>
Subject: RE: Brittney Cooke v. TitleMax of Virginia, Inc. d/b/a TitleMax - Case 01-22-0004-5528

Yes, Drew, thank you for confirming. If you become aware of an administrative closure of an action, or a threatened administrative closure, feel free to contact Adrienne directly. Tony

From: Drew Brown <drew@greensborolawcenter.com>
Sent: Thursday, January 5, 2023 1:43 PM
To: Durone, Anthony J. <ADurone@BerkowitzOliver.com>
Subject: FW: Brittney Cooke v. TitleMax of Virginia, Inc. d/b/a TitleMax - Case 01-22-0004-5528

Do you agree with her that I am free to contact her?

Drew Brown
Brown, Faucher, Peraldo & Benson, PLLC
822 N. Elm St., Suite 200
Greensboro, NC 27401
336.478.6000
drew@greensborolawcenter.com
greensborolawcenter.com



From: Adrienne Rowberry <Adrienne.Rowberry@titlemax.com>
Sent: Thursday, January 5, 2023 2:42 PM
To: Drew Brown <drew@greensborolawcenter.com>; Consumer Case Filing Team <ConsumerFiling@adr.org>
Cc: Kellie <kellie@greensborolawcenter.com>; Marian Martin <Marian.Martin@titlemax.com>; Deidre Paez <Deidre.Paez@titlemax.com>; William Ruby <William.Ruby@titlemax.com>
Subject: RE: Brittney Cooke v. TitleMax of Virginia, Inc. d/b/a TitleMax - Case 01-22-0004-5528

Mr. Brown,

You are welcome to contact me directly regarding administrative closures. I told outside counsel that quite some time ago and don't know why that wasn't communicated to you. Although, that wouldn't have solved this particular issue. Troutman Pepper simply did not inform us that this matter had been initiated or administratively closed.

Adrienne Rowberry
Corporate & Litigation Counsel



15 Bull St Ste 200
Savannah, GA 31401
Direct Line (912) 721-0812
adrienne.rowberry@titlemax.com

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From: Drew Brown <drew@greensborolawcenter.com>
Sent: Thursday, January 5, 2023 12:38 PM
To: Adrienne Rowberry <Adrienne.Rowberry@titlemax.com>; Consumer Case Filing Team <ConsumerFiling@adr.org>
Cc: Kellie <kellie@greensborolawcenter.com>; Marian Martin <Marian.Martin@titlemax.com>; Deidre Paez <Deidre.Paez@titlemax.com>; William Ruby <William.Ruby@titlemax.com>
Subject: RE: Brittney Cooke v. TitleMax of Virginia, Inc. d/b/a TitleMax - Case 01-22-0004-5528

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I am not permitted to contact Ms. Rowberry directly. I would love to do that and that would help. Her outside counsel refuses to allow me to do so.

Drew Brown
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336.478.6000
drew@greensborolawcenter.com
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From: Adrienne Rowberry <Adrienne.Rowberry@titlemax.com>
Sent: Thursday, January 5, 2023 2:31 PM
To: Consumer Case Filing Team <ConsumerFiling@adr.org>
Cc: Drew Brown <drew@greensborolawcenter.com>; Kellie <kellie@greensborolawcenter.com>; Marian Martin <Marian.Martin@titlemax.com>; Deidre Paez <Deidre.Paez@titlemax.com>; William Ruby <William.Ruby@titlemax.com>
Subject: RE: Brittney Cooke v. TitleMax of Virginia, Inc. d/b/a TitleMax - Case 01-22-0004-5528

Received, thank you.

Can you provide me with more information re this statement – “Prior to the filing of this arbitration, TitleMax of Virginia, Inc. d/b/a TitleMax failed to comply with the AAA’s policies regarding consumer claims, set forth in the Consumer Due

Process Protocol ("Protocol") and the Consumer Arbitration Rules ("Consumer Rules"), including the Costs of Arbitration, which can be found on our web site, www.adr.org. Accordingly, we must decline to administer this claim and any other claims between TitleMax of Virginia, Inc. d/b/a TitleMax and its consumers at this time."

I need to understand how we failed to comply.

Also, I want to make sure we are all clear on your communication and instruction below. AAA is not willing to notify me of administrative closures? It is AAA's position that Claimant's attorney is responsible for notifying me of administrative closures?

We really need to find a way for these three organizations – TitleMax entities, AAA and Greensboro Law Center – to work together. These administrative closures followed by a motion for contempt and sanctions is a huge waste of time, energy and resources for all involved. And not to mention, a waste of the Court's time and resources.

I beg you, AAA, to propose a solution since the requests in my 12/6 letter seem to have been rejected.

Adrienne Rowberry
Corporate & Litigation Counsel



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From: Consumer Case Filing Team <ConsumerFiling@adr.org>
Sent: Thursday, January 5, 2023 12:04 PM
To: Adrienne Rowberry <Adrienne.Rowberry@titlemax.com>
Cc: Consumer Case Filing Team <ConsumerFiling@adr.org>; drew@greensborolawcenter.com; Kellie <kellie@greensborolawcenter.com>; Marian Martin <Marian.Martin@titlemax.com>; Deidre Paez <Deidre.Paez@titlemax.com>; William Ruby <William.Ruby@titlemax.com>
Subject: RE: Brittney Cooke v. TitleMax of Virginia, Inc. d/b/a TitleMax - Case 01-22-0004-5528

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Good Afternoon,

Thank you for your correspondence. Please be advised that the above referenced case is closed, closing letter attached.

Per the AAA Consumer Rules, it is the responsibility of the Claimant to serve the Respondent. **At this time we kindly ask the claimant to provide the respondent with the requested documents per the below request.**

Thank You,
Consumer Filing Team



Consumer Case Filing Team

1101 Laurel Oak Road
Suite 100, Voorhees, NJ 08043
E: ConsumerFiling@adr.org



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From: Adrienne Rowberry <Adrienne.Rowberry@titlemax.com>
Sent: Thursday, January 5, 2023 11:56 AM
To: Consumer Case Filing Team <ConsumerFiling@adr.org>
Cc: drew@greensborolawcenter.com; Kellie <kellie@greensborolawcenter.com>; Marian Martin <Marian.Martin@titlemax.com>; Deidre Paez <Deidre.Paez@titlemax.com>; William Ruby <William.Ruby@titlemax.com>
Subject: Brittney Cooke

***** External E-Mail – Use Caution *****

Hello AAA Consumer Case Filing Team,

Could you please send me all notices and filings you have relating to the Brittney Cooke matter? Could you also please send me any emails or other correspondence regarding the Brittney Cooke matter that AAA sent to our former outside counsel Troutman Pepper?

Apparently this matter has been administratively closed resulting in Mr. Brown filing the attached Motion to Show Cause. We have not received any information or documentation whatsoever from our former outside counsel Troutman Pepper regarding this matter. We had no idea this matter had been initiated with AAA.

Lastly, I am sending, again, the attached letter that was previously emailed to AAA on 12/6 stating “in the event you run into any issues whatsoever, including those that could result in an administrative closure of a new arbitration matter, please contact myself, Deidre Paez and Marian Martin directly so that we may attempt to resolve any issue prior to an administrative closure.” If AAA is not willing or able to honor this request, please let me know. I was under the impression that this letter was acknowledged and agreed to.

Thank you,
Adrienne Rowberry
Corporate & Litigation Counsel



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From: ECF@ncmd.uscourts.gov <ECF@ncmd.uscourts.gov>

Sent: Thursday, January 5, 2023 8:37 AM

To: ecf@ncmd.uscourts.gov

Subject: Activity in Case 1:20-cv-00347-LCB-JLW RICHARDS et al v. TITLEMAX OF VIRGINIA, INC. et al Motions Submitted

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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U.S. District Court

North Carolina Middle District

Notice of Electronic Filing

The following transaction was entered on 1/5/2023 at 9:37 AM EST and filed on 1/5/2023

Case Name: RICHARDS et al v. TITLEMAX OF VIRGINIA, INC. et al

Case Number: [1:20-cv-00347-LCB-JLW](#)

Filer:

Document Number: No document attached

Docket Text:

Motion Submitted: [33] MOTION for Order to Show Cause to JUDGE LORETTA C. BIGGS. (Blay, Debbie)

1:20-cv-00347-LCB-JLW Notice has been electronically mailed to:

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